



May 23, 2019

**VIA ECF**

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Honorable Kenneth Karas, U.S.D.J.  
U.S. District Court for the S.D.N.Y.  
300 Quarropas Street  
White Plains, NY 10601

**Re: Citizens United To Protect Our Neighborhoods, Hilda Kogut, Robert Asselbergs,  
and Carole Goodman v. Village of Chestnut Ridge, Case 7:19-cv-03461**

Dear Judge Karas:

We represent Citizens United to Protect Our Neighborhoods ("CUPON"), Hilda Kogut, Robert Asselbergs, and Carole Goodman, the Plaintiffs in the above-referenced action, which is pending before Judge Román (the "Establishment Clause Litigation"). While Your Honor has already decided this issue, out of an abundance of caution, Plaintiffs in the Establishment Clause Litigation respectfully submit this letter in response to the letter of the OJC Plaintiffs in the action pending before Your Honor titled Orthodox Jewish Coalition of Chestnut Ridge et al. v. Village of Chestnut Ridge, New York, Case 7:19-cv-00443.

Your Honor already decided this issue when you denied Defendant Village of Chestnut Ridge's letter request for consolidation on May 22, 2019. You noted in your order that the two actions are not related as they present "different challenges to different statutes." (See Doc. 13). The OJC Plaintiffs repeat the same arguments that the Village Defendant made two days ago; and they completely fail to address the argument that their Action is moot because the Village enacted a new zoning law. Lastly, it is the height of gall to say that the Plaintiffs in the Establishment Clause Litigation are "forum-shopping." This latest effort to revisit Your Honor's prior ruling and consolidate should not be allowed.

Respectfully submitted,

COZEN O'CONNOR

By: s/ Michael B. de Leeuw

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